

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
FRANCES ALEASE REDDY, a/k/a "Muslima Alston"	:	VIOLATIONS: 18 U.S.C. § 1344 (bank fraud - 2 counts) Notice of additional factors

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, The Germantown Federal Credit Union was a financial institution, the deposits of which were insured by the National Credit Union Administration.

2. From on or about January 18, 1995, to on or about January 24, 1995, at Philadelphia, in the Eastern District of Pennsylvania, defendant

FRANCES ALEASE REDDY,
a/k/a "Muslima Alston,"

knowingly executed and attempted to execute a scheme to defraud The Germantown Federal Credit Union and to obtain monies owned by and under the custody of The Germantown Federal Credit Union by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. The object of the scheme was for defendant FRANCES ALEASE REDDY to obtain money by giving a counterfeit check to others for them to cash, with each participant getting a cut of the proceeds.

It was part of the scheme that:

4. Defendant FRANCES ALEASE REDDY obtained a counterfeit check in the amount of \$15,500 payable to Versatile Water Proofing Company dated January 18, 1995, check number 1130, drawn on the account of R.M.G. at Vanguard Pennsylvania Tax Free Fund, payable through CoreStates Bank of Delaware NA.

5. Defendant FRANCES ALEASE REDDY gave the counterfeit check to David Mayfield, charged elsewhere, for negotiation. Mayfield then gave the counterfeit check to D.L. and V.W., two persons known to the grand jury for negotiation.

6. On or about January 20, 1995, D.L. and V.W. deposited the counterfeit check into an account they maintained at The Germantown Federal Credit Union.

7. On or about January 24, 1995, D.L. and V.W. obtained a check in the amount of \$15,000 drawn on their account at The Germantown Federal Credit Union and cashed the check at a branch of Mellon PSFS Bank. D.L. and V.W. kept \$3,750 of the proceeds and delivered the remaining \$11,250 to David Mayfield.

Mayfield in turn kept \$3,750 and delivered the remaining \$7,500 to defendant FRANCES ALEASE REDDY.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Johnstown Bank and Trust Company was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. From on or about March 25, 1995, to on or about April 21, 1995, at Philadelphia, in the Eastern District of Pennsylvania, defendant

FRANCES ALEASE REDDY,
a/k/a "Muslima Alston,"

knowingly executed and attempted to execute a scheme to defraud Johnstown Bank and Trust Company and to obtain monies owned by and under the custody of Johnstown Bank and Trust Company by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. The object of the scheme was for defendant FRANCES ALEASE REDDY to obtain money by giving a counterfeit check to another person for him to cash, with each participant getting a cut of the proceeds.

It was part of the scheme that:

4. On or about March 25, 1995, defendant FRANCES

ALEASE REDDY informed David Mayfield, charged elsewhere, that she had counterfeit corporate checks which she wanted to negotiate.

5. On or about March 28, 1995, defendant FRANCES ALEASE REDDY met with Mayfield and agreed to supply him with a counterfeit check payable to Maverick Recovery and Storage Company in an amount between fifty thousand and sixty thousand dollars for negotiation on her behalf.

6. On or about April 3, 1995, defendant FRANCES ALEASE REDDY placed a telephone call to Mayfield and arranged to meet him in the parking lot of Houlihan's, 555 City Line Avenue, Bala Cynwyd, Pennsylvania, to deliver a counterfeit check.

7. On or about April 3, 1995, defendant FRANCES ALEASE REDDY met Mayfield and delivered a counterfeit check in the amount of \$50,650 payable to Maverick Storage Company dated March 30, 1995, check number 025654, drawn on the account of Rockwood Casualty Insurance Company at Johnstown Bank and Trust Company for negotiation.

8. Between on or about April 5, 1995, and on or about April 21, 1995, defendant FRANCES ALEASE REDDY made six telephone calls to Mayfield to determine whether he had been able to negotiate the counterfeit check on her behalf.

In violation of Title 18, United States Code, Section 1344.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

_____ In committing the offenses charged in Counts One and Two of this indictment, defendant FRANCES ALEASE REDDY:

a. Committed an offense in which the loss exceeded \$40,000, as described in U.S.S.G. § 2F1.1(b) (1) (F); and

b. Committed an offense which involved more than minimal planning and a scheme to defraud more than one victim, as described in U.S.S.G. § 2F1.1(b) (2) .

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney